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November 24, 2021

Clerk  
United States District Court  
Clarkson S. Fisher U.S. Courthouse  
402 East State Street, Courtroom 5E  
Trenton, NJ 08608

**Re: LTL Management, LLC**  
**U.S. Bankruptcy Court D.N.J. Case No.: 21-30589-MBK**

**LTL Management, LLC v. Those Parties Listed on Appendix A to**  
**Complaint and John and Jane Does 1-1000.**  
**U.S. Bankruptcy Court D.N.J. Adv. Pro. No.: 21-03032-MBK**

Dear Clerk of the United States District Court:

The undersigned's firm is proposed local bankruptcy counsel for the Official Committee of Talc Claimants (the "Committee") of LTL Management LLC (the "Debtor"), in the above-referenced matters. Enclosed is a Motion by the Committee to withdraw the reference (the "Motion") of adversary proceeding 21-03032 (the "Adversary Proceeding").

As detailed in the Motion, the above-captioned bankruptcy case was filed in the United States Bankruptcy Court for the Western District of North Carolina (the "WDNC Bankruptcy Court") on October 14, 2021. On November 8, 2021, the WDNC Bankruptcy Court entered an order appointing the Committee pursuant to Section 1102(a)(1) of the Bankruptcy Code upon the motion of the United States Bankruptcy Administrator for the Western District of North Carolina. [Case No.: 21-30589; D.I. 355] The Committee has been functioning and performing its duties since appointment.

On November 16, 2021, the WDNC Bankruptcy Court entered an *Order Transferring Case to the District of New Jersey*. [Case No.: 21-30589; D.I. 416] On November 24, 2021, the United States Bankruptcy Court for the District of New Jersey entered the *Stipulation and Agreed Order Authorizing the Official Committee of Talc Claimants to Intervene in Preliminary Injunction Adversary Proceeding* (the "Stipulation to Intervene").



The Committee understands that Chief Judge Freda L. Wolfson oversees that certain related litigation pending in the United States District Court for the District of New Jersey, captioned In re Johnson & Johnson Talcum Powder Products Marketing, Sales Practices, and Products Liability Litigation, assigned case number 16-2738 (the “MDL Litigation”). Based on Her Honor’s extensive familiarity with the MDL Litigation, the Committee respectfully submits that Judge Wolfson is best suited to make an ultimate determination on the Committee’s Motion. The Motion and this letter have been served on the Debtor and counsel for other parties in interest.

Respectfully submitted,

**GENOVA BURNS LLC**

*/s/Angelo J. Genova*  
ANGELO J. GENOVA

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cc: Service List